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October 21, 2020

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The application is GRANTED in part. By **October 29, 2020**, Plaintiffs shall file its motion for preliminary collective certification. By **November 19, 2020**, Defendants shall file its opposition. By **November 30, 2020**, Plaintiffs shall file their reply.

VIA ECF

Hon. Lorna G. Schofield

United States District Judge

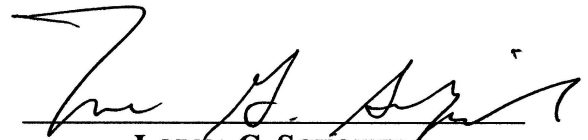
500 Pearl St

New York, NY 10007

SO ORDERED.

Dated: October 22, 2020

New York, New York



LORNA G. SCHOFIELD

UNITED STATES DISTRICT JUDGE

Re: Alicia Velasquez v. Lities Corp., et al.

Case No. 20-cv-04208-LGS

Letter Request for Extension of the Motion Filing for Preliminary Collective Certification

Dear Hon. Lorna G. Schofield:

This office represents the Plaintiffs in the above referenced matter. I write to ask for an extension for the motion for preliminary collective certification that was originally due on October 22, 2020 until October 29, 2020. Defendants' counsel Samuel Viruet has refused our extension request without giving any reason. This is the first request for extension of the motion filing.

Pursuant to the Order on September 10, this office conferred with Defendants' counsel on October 15, 2020 regarding preliminary collective certification. As Defendants were not willing to stipulate to the certification, this office had started working on the motion for preliminary collective certification since then. Currently, this firm is working on the Client affidavits in support of the Plaintiffs' motion for preliminary collective certification.

There are five Plaintiffs' signatures to be collected to our office. Due to the social distance requirement and most of our staff are working remotely, this firm is facing some difficulty in scheduling the Plaintiffs' for an in-person meeting. However, we are attempting to have the Plaintiffs sign their affidavits via remote means. The Plaintiffs are waitress, dishwasher, cook, thus, they have limited ability to complete signature remotely. This firm is advising the Plaintiffs regarding how they can complete signatures via mobile apps.

Accordingly, we respectfully request that the Court grants another one-week extension until October 29, 2020 for us to file this motion. We also respectfully request that the Court extends Defendants' opposition time from November 12, 2020 to November 19, 2020 and Plaintiff's reply time from November 19, 2020 to December 3, 2020. We thank the Court for its time and attention to this matter.

Very Truly Yours,

/s/ Yuezhu Liu